

REED SMITH LLP

Formed in the State of Delaware

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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

GEORGE MCCANTS, an individual, the
borrower, and the mortgagor of the real
property incorporated by reference below
residing in New Jersey,

Plaintiff,

vs.

JPMORGAN CHASE & CO., D/B/A
JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION, a Delaware foreign for-
profit business corporation, and assignee of
the real property situated at 92-94 Tuxedo
Parkway in Newark, with domestic
incorporation in New Jersey,

Defendant.

Civil Action No. 2:24-cv-05837-
CCC-JSA

**NOTICE OF MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT PURSUANT
TO FEDERAL RULE OF
CIVIL PROCEDURE 12(b)(1)
AND (6)**

Motion Date: January 21, 2025

DOCUMENT
ELECTRONICALLY FILED

TO: George McCants
1254 Clinton Place
Elizabeth, New Jersey 07298
Pro Se Plaintiff

PLEASE TAKE NOTICE THAT Reed Smith LLP, counsel for Defendant JPMorgan Chase Bank, N.A. (“Defendant”), incorrectly sued as JP Morgan Chase & Co d/b/a JP Morgan Chase Bank National Association, shall move before the Honorable Judge Claire C. Cecchi, U.S.D.J., at the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, on a Motion to Dismiss Plaintiff George McCants’ Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1) and (6).

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant shall rely on the Memorandum of Law submitted herewith and the Certification of Greyson K. Van Dyke, with exhibits.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting Defendant’s Motion to Dismiss is enclosed herewith.

REED SMITH LLP

/s/Greyson K. Van Dyke

Greyson K. Van Dyke

Dated: December 16, 2024